

# Sage Legal LLC

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December 28, 2024

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Cheryl L. Pollak, U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13B South  
Brooklyn, NY 11201-1804

**Re: Ortega v. Champagne Room BK, Inc., et al.**  
**Case No.: 1:21-cv-1125 (NGG) (CLP)**

Dear Judge Pollak:

This office represents the Plaintiff Iluminada Ortega (hereinafter the “Plaintiff”) in the above referenced case. Plaintiff writes to respectfully submit the billing records<sup>1</sup> as required pursuant to this Court’s Orders. Plaintiff apologizes for the one-day delay, as your undersigned was ill and confined to bed over the last day. Plaintiff thus requests an extension of time, *nunc pro tunc*, to submit billing records in connection with the renewed letter motion for settlement approval. Plaintiff respectfully submits that good cause and excusable neglect exists for the requested extension because of the foregoing circumstances. See Fed. R. Civ. P. 6(b)(1)(B).

Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York  
December 28, 2024

Respectfully submitted,  
**SAGE LEGAL LLC**  
/s/ Emanuel Kataev, Esq.  
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*Ortega Iluminada*

Enclosures.

**VIA ECF**

All counsel of record

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<sup>1</sup> Shalom Law, PLLC’s billing records are complete. Sage Legal LLC’s billing records are through September 2024. Plaintiff respectfully submits that the lodestar is far greater than the fees obtained by way of the settlement agreement.